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*Class Counsel*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE UKG INC CYBERSECURITY  
LITIGATION

THIS DOCUMENT RELATES TO:

All Actions.

Case No.: 3:22-cv-00346-SI

**DECLARATION OF MICHAEL  
MORRISON IN SUPPORT OF  
PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

**Date: November 17, 2023**

**Time: 10:00 a.m.**

**Dept.: Courtroom 1, 17th Floor**

**Judge: Honorable Susan Illston**

**DECLARATION OF MICHAEL MORRISON**

I, Michael Morrison, declare as follows:

1. I am an attorney-at-law and named partner at the law firm of Alexander Morrison + Fehr LLP. I am duly admitted to practice before this Honorable Court and am one of the attorneys of record for Plaintiffs in this action. I have personal knowledge of the facts set forth herein, (except where indicated upon information and belief) and if called as a witness, could and would testify competently thereto. I am making this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

**UPDATED INFORMATION RE: WORK PERFORMED AND LODESTAR**

2. Since the filing of the Motion for Attorneys' Fees on August 14, 2023, I have performed additional work on this case. This work has consisted of: (1) reviewing emails from the Settlement Administrator and counsel for the parties regarding notice efforts and responses from class members; (2) participating in phone calls and email exchanges with the Settlement Administrator and counsel to discuss ways to increase class member participation in the Settlement; (3) reviewing and approving the language in reminder notices which were sent to class members; (4) speaking with class members with questions about the Settlement; and (5) working on the final approval papers.

3. After securing this Settlement, Class Counsel has not sat back and waited for final approval. Instead, they have been proactive in monitoring the notice efforts and claims rate to ensure maximum participation in the Settlement. This led to multiple phone calls between counsel for the parties and the Settlement Administrator to discuss the reach of the notice efforts, the response rate for claims, as well as additional actions which could be undertaken to increase class member participation in the Settlement. The result of these meetings was an agreement to send reminder post-cards to members of the exfiltration class and emails to other class members reminding them of the deadline to submit claims.

4. As of the filing of this declaration, my updated lodestar is \$205,105.00 (241.3 hrs x \$850.00). I expect to incur an additional 5-10 hours of work preparing for the final approval

1 hearing, dealing with various case issues from the Settlement Administrator, and handling class  
2 member inquiries.

3 I declare, under penalty of perjury of the laws of California, the foregoing to be true and  
4 correct. Executed this 16th day of October, 2023 in Los Angeles, CA.

5 /s/ Michael Morrison  
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